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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) NO. CR-17-491-RS  
)  
v. ) STIPULATION AND [PROPOSED] ORDER  
 ) SETTING SCHEDULE FOR PRE-TRIAL FILINGS  
 ) (AS MODIFIED BY THE COURT)  
MARC HOWARD BERGER, )  
Defendant. )  
\_\_\_\_\_  
)

In anticipation of the June 11, 2018 pre-trial conference in the above referenced matter, the parties agree and stipulate to the briefing schedule below, adapted from the Court's standing order regarding jury trials.

May 25, 2018: Deadline to exchange proposed jury instructions  
June 1, 2018: Deadline to file motions *in limine*  
June 6, 2018: Deadline to file proposed jury instructions, juror questionnaires, voir dire questions, and verdict forms

STIPULATION AND [PROPOSED] ORDER  
RE SCHEDULE FOR PRE-TRIAL FILINGS (AS MODIFIED BY THE COURT)  
[CR-17-491-RS]

June 8, 2018: Deadline to file any responses to motions *in limine*

## IT IS SO STIPULATED.

Respectfully submitted,

Dated: May 21, 2018

/s/

MIRANDA KANE  
Kane + Kimball LLP  
Attorneys for Defendant Marc H. Berger

Dated: May 21, 2018

/s/

**ROBERT S. LEACH**  
Assistant United States Attorney

/s/

LORI A. HENDRICKSON

**Trial Attorney  
U.S. Department of Justice, Tax Division**

**STIPULATION AND [PROPOSED] ORDER  
RE SCHEDULE FOR PRE-TRIAL FILINGS (AS MODIFIED BY THE COURT)  
[CR-17-491-RS]**

1                   [PROPOSED] ORDER

2       The Court HEREBY ORDERS the following schedule for the parties' pre-trial filings.

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4       May 25, 2018:           Deadline to exchange proposed jury instructions

5       June 1, 2018:           Deadline to file motions *in limine*

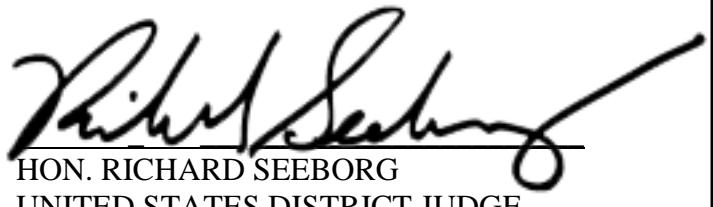
6       June 6, 2018:           Deadline to file proposed jury instructions, juror questionnaires\*, voir dire  
7                   questions, and verdict forms  
8                   **\*The parties are expected to submit a jointly proposed jury  
9                   questionnaire. Failure to agree on a questionnaire may result in  
10                  proceeding without one.**

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12       June 8, 2018:           Deadline to file any responses to motions *in limine*

13                   **IT IS SO ORDERED.**

14       Dated: May 21, 2018



HON. RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE